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Videotaped Deposition of
Stephen Hindle
April 29, 2025

In Re Bank of America CA Unemployment Benefits Litigation
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Stephen Hindle **In Re Bank of America CA Unemployment Benefits Litigation**

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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

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IN RE BANK OF AMERICA : Case No.
CALIFORNIA UNEMPLOYMENT :
BENEFITS LITIGATION : 3:21-md-02992-GPC-MSB
:
- - - - -x

VIDEOTAPED DEPOSITION OF

STEPHEN HINDLE

TAKEN ON BEHALF OF THE PLAINTIFF

Tuesday, April 29, 2025

10:05 a.m. - 7:25 p.m.

**** CONFIDENTIAL ****

REPORTED BY:

Okeemah S. Henderson, Court Reporter

Job No. 10163116

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1 **Group?**

2 A. Yes. Thank you.

3 **Q. Did you have any separate**
4 **meetings with them to prepare?**

5 MR. RIFFEE: Objection to form.

6 A. No with -- every meeting we've
7 had is with Matt -- with counsel.

8 BY MR. JONES:

9 **Q. Have you spoken with any Bank**
10 **of America employees to prepare for today?**

11 A. No.

12 **Q. Did you bring any documents**
13 **into the deposition with you?**

14 A. No.

15 **Q. Did you bring any notes into**
16 **the deposition with you?**

17 A. No. No, sir.

18 **Q. You've prepared two expert**
19 **reports in this case; is that correct?**

20 A. Yes.

21 MR. JONES: We will mark your report
22 dated April 4th, 2025 as Exhibit 1, and your
23 report dated October 24th, 2024 as Exhibit 2.
24 (Exhibits 1-2 were marked for identification.)

25 BY MR. JONES:

1 Q. Did any of your opinions change
2 between your October 2024 report and your April
3 2025 report?

4 MR. RIFFEE: Objection. Form.

5 A. No, sir.

6 BY MR. JONES:

7 Q. Did you omit any opinions that
8 were in your October report from your April
9 report?

10 MR. RIFFEE: Objection. Form.

11 A. I don't believe so.

12 BY MR. JONES:

13 Q. Did you revise any opinions
14 between the two reports?

15 A. No, sir. I don't believe so.

16 Q. So the April 2025 report
17 constitutes all of your opinions and the basis
18 for those opinions in this case?

19 MR. RIFFEE: Objection. Form.

20 A. All of the opinions that I have
21 based on the facts that I know at the moment, I
22 still reserve the right to provide additional
23 commentary or opinions as more things come to
24 light.

25 BY MR. JONES:

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1 Q. How did you obtain the
2 materials listed in Appendix A?

3 MR. RIFFEE: Objection. Form.

4 A. We requested them through
5 counsel.

6 BY MR. JONES:

7 Q. Did you request specific
8 documents?

9 A. No, we were provided with a
10 document set from counsel, and then where we
11 didn't find information, we requested that from
12 counsel.

13 Q. So counsel provided you an
14 initial universe of documents; is that correct?

15 A. Yes.

16 Q. And after that, did you request
17 specific documents?

18 MR. RIFFEE: Objection. Form.

19 A. Yes, I made a request for a
20 couple of pieces of additional information.

21 BY MR. JONES:

22 Q. Were you provided the documents
23 you were asked for?

24 A. With the exception of one; the
25 information didn't exist.

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1 Q. What did you ask for?

2 A. I was asking to see if there
3 was additional information or retained
4 information around the INI (ph), the caller ID,
5 within the Bank of America subset from the
6 telephony system, but that information wasn't
7 retained.

8 Q. You said ANI, is that sometimes
9 called ANI data?

10 A. Yes, ANI, ANA data is the
11 caller ID. It's telephone number of the
12 caller.

13 Q. Were there any materials other
14 than what you just described that you would
15 have liked to review that were not made
16 available to you?

17 MR. RIFFEE: Objection. Form.

18 A. Sorry. No.

19 MR. RIFFEE: Just give me a moment to
20 object. You can answer.

21 A. No.

22 BY MR. JONES:

23 Q. Have you considered any
24 additional materials since issuing your April
25 report?

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CERTIFICATE

I, Okeemah S. Henderson, RPR, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me stenographically and thereafter reduced to typewriting under my direction; that reading and signing was not requested; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 23rd day of May, 2025.

My commission expires:

November 30, 2027



Okeemah S. Henderson, RPR
Official Court Reporter